



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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**NOV 10 2016**

Ref: 8EPR-N

Bridget Clayton  
Gunnison Sage-Grouse EIS  
BLM Colorado State Office  
2850 Youngfield Street  
Lakewood, Colorado 80215

RE: Gunnison Sage-Grouse Rangewide Draft Resource Management Plan Amendment and  
Draft Environmental Impact Statement, **CEQ #20160185**

Dear Ms. Clayton:

The U.S. Environmental Protection Agency Region 8 has reviewed the July 2016 Draft Environmental Impact Statement (EIS) prepared by the Bureau of Land Management (BLM) for the Gunnison Sage-Grouse Rangewide Draft Resource Management Plan (RMP) Amendment and Draft Environmental Impact Statement (EIS). Our comments are provided for your consideration pursuant to our responsibilities and authorities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

### **Project Background**

On November 20, 2014, the U.S. Fish and Wildlife Service (FWS) published a final rule listing the Gunnison Sage-Grouse (GUSG) as a threatened species and designating critical habitat. The BLM manages approximately 40 percent of GUSG habitat across twelve counties in southwestern Colorado and southeastern Utah. The inadequacy of regulatory mechanisms to conserve the Gunnison Sage-Grouse and its habitat was identified as a major threat in the FWS listing decision. The FWS has proposed conservation measures to be included in RMPs as the principal mechanism to assure adequate conservation of the Gunnison Sage-Grouse and its habitat on public lands. The EIS analyzes proposed amendments to the BLM's RMPs to incorporate additional conservation measures to protect the Gunnison Sage-Grouse and its habitat. This EIS covers the range of the species and considers amendments to the following RMPs: Canyons of the Ancients National Monument, Dominguez-Escalante National Conservation Area (NCA), Grand Junction Field Office (FO), Gunnison Gorge NCA, Gunnison Resource Area, McInnis Canyons NCA, San Luis Resource Area, Tres Rios FO, San Juan/San Miguel, and Uncompahgre Basin in Colorado; and Moab FO and Monticello FO in Utah.

Three management alternatives are analyzed in the Draft EIS:

- Alternative A, the No Action Alternative, would continue current management direction.

- Alternative B is based on the GUSG conservation measures and threats identified in the FWS listing decision, and avoids negative impacts from resource uses and other actions in Occupied Habitat and Unoccupied Habitat.
- Alternative C would allow resource uses and other actions in Occupied Habitat and Unoccupied Habitat if impacts could be minimized or compensated for.
- Alternative D, the Agency Preferred Alternative, seeks to balance protection, habitat restoration and enhancements, and use of resources and services. Conservation measures are focused on both Occupied Habitat and Unoccupied Habitat. This alternative includes two sub-alternatives based on the different extent, scale and nature of threats to different GUSG populations. Alternative D1 is specifically designed for the large, contiguous Gunnison Basin Population and Alternative D2 is designed for the smaller satellite populations.

## **EPA's Comments and Recommendations**

### *Areas of Critical Environmental Concern*

Under Alternative B, all Occupied and Unoccupied Habitat would be designated as an Area of Critical Environmental Concern (ACEC). These areas would be managed with greater restrictions than public lands outside the boundaries of the ACEC, including limitations on travel, designation as a ROW exclusion area, closure to fluid mineral leasing and recommending the ACEC be withdrawn from locatable mineral entry. No new ACECs would be designated under Alternative C or Alternative D. We recommend that the BLM consider designating specific areas with highly valuable habitat as an ACEC in the Preferred Alternative. For example, certain areas may have particularly undisturbed and valuable sagebrush habitat or may protect a vulnerable GUSG population.

### *Alternatives Analysis -- Relative Protectiveness of GUSG Populations*

We recommend that the BLM add a section in the Final EIS to compare the anticipated outcomes of each alternative in protecting GUSG populations long-term. Section 4.2 -*Environmental Consequences -- Special Status Species* in the Draft EIS considers two indicators of impacts on GUSG: acres of sagebrush habitat and direct and indirect disturbance to GUSG. While these indicators are clearly linked to the success of GUSG populations, the resulting direct and indirect impacts on GUSG populations are not presented. Further, the document does not include a summary of how the alternatives compare in protecting sage grouse populations and if the actions in the proposed alternatives are likely to be sufficient to sustain populations of the species. We understand that it would not be possible to have a definitive, quantitative discussion on the future of GUSG populations; however, a qualitative summary would add an important component to the decision-making process and improve the public's ability to understand the expected outcomes of the alternatives. We recommend that the summary indicate whether GUSG populations in the seven population areas are likely to be stable, increasing, or decreasing under the three action alternatives, and compare this condition to the current condition of the population areas discussed in Section 3.1.

### *Monitoring, Mitigation and Adaptive Management*

Adaptive management is a valuable tool for protecting resources in situations where specific mitigation needs are uncertain at the project outset or may change over time. We support the intent, stated in the Draft EIS, to develop a detailed adaptive management plan to enable the BLM to address unintended negative consequences to GUSG. This plan would include a monitoring framework, science-based

triggers for action, and specific management actions to address causal factors.

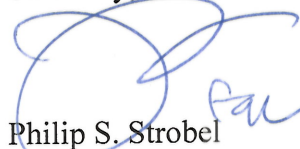
While Appendix J states that a Mitigation Strategy will be developed for inclusion in the Final EIS, Chapter 2 indicates that a monitoring framework will be developed as part of the implementation plan. The timing of the implementation plan relative to the Final EIS is not clear. Therefore, we recommend that a detailed adaptive management plan for protecting GUSG and its habitat, including a monitoring framework, be included in the Final EIS.

### **Closing and EPA Rating**

Based on our review, the EPA is rating the Draft EIS Preferred Alternative as “Environmental Concerns – Insufficient Information” (EC-2). The “EC” rating means that the EPA’s review has identified potential impacts that should be avoided in order to fully protect the environment. It is not clear from the analysis if the Preferred Alternative is sufficiently protective to increase and/or maintain sustainable GUSG populations. The “2” rating means that the Draft EIS does not contain sufficient information for the EPA to fully assess environmental impacts. A description of the EPA’s rating system can be found at: <http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria>.

Thank you for the opportunity to review and comment on this Draft EIS. If you have any questions or would like to discuss our comments, please feel free to contact me at 303-312-6704. You may also contact Molly Vaughan, lead reviewer for this project, at 907-271-1215 or by email at [vaughan.molly@epa.gov](mailto:vaughan.molly@epa.gov).

Sincerely,



Philip S. Strobel  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

